

## REMARKS

Claims 1-13 and 15 are currently pending in the application. Claims 13 and 15 have been amended to correct their dependency claim references. Reconsideration of the claims is respectfully requested.

### I. 35 U.S.C. § 103, obviousness

The Examiner has rejected claims 1-15 under 35 U.S.C. § 103(a) as being unpatentable over Williams et al. (US Publication No. 2003/0055812) in view of Honjo et al. (US Publication No. 2001/0056378) and further in view of Bailey et al. (2002/0091690). This rejection is respectfully traversed.

In rejecting the claims, the Examiner writes:

For claims 1 (a system) and 8 (a method), Williams discloses a computer system and corresponding method for identifying a part, the system comprising:

a scalable database ([0023], [0029]) of identification data sets (data sets stored in the tables of Fig. [sic]), each data set descriptive of an item (lines 2-5 in [0043]) and comprising data for alternate numbering schemes (industry reference number and casting I.D., lines 1-7 in [0061])) geared toward different segments of an industry (different factories of the same part manufacturing industry), a family category (516 in Fig. 5), picture files depicting the item (field “part Img” of parts table in Fig. 5), and identification criteria (fields in product table) defined from the family category (Fig. 5);

a computer-readable medium (memory 106 in Fig. 1, [0022]);

a processor (104 in Fig. 1, [0022]) in communication with the computer-readable medium and the database; and

computer readable instructions on the computer readable medium for execution by the processor (lines 1-3 in [0025]), the instructions configured to receive user input from an input device and retrieve at least one data set descriptive of an item from the database based upon input received ([0042]),

present a results screen (relational database parts display window 122 of GUI display 114), the screen including the at least one data set retrieved based upon input received ([0042]).

However, Williams does not explicitly teach each data set comprising data for a plurality of alternate number schemes geared toward different stages o product lifecycle. But, Williams teaches that the user can determine, using his invention, any form of factory identification used to identify a part (lines 14-16 in [0061]). This teaching not only further clarifies that Williams teaches alternate numbering schemes geared toward different segments of an industry, but also at least suggests or makes it obvious that any form of or alternate number schemes necessitated by different considerations can also be incorporated in his invention if needed. Honjo discloses such an exemplary consideration. He teaches a method and system for managing parts used in fluid machinery, wherein he uses

an independent control number (control identifier) for each of the parts used in fluid machinery at the plant considering the need to manage stocked spare parts (that is, during the aftermarket stage of the products lifecycle) ([0054]).

The Williams invention only uses one numbering scheme in its data set for identifying each part, specifically, the industry reference number. The only other significant numbering scheme used is the OEM number. However, as explained in Williams, the OEM number is not an equivalent alternate to the industry reference number:

[0058] The OEM number column 392 contains the OEM number of the part. It may be desired to have the part renamed to contain the identifying information of the original equipment manufacturer part. **For example, the OEM part may refer to a part that includes multiple subparts. This can cause of confusion in that an OEM number can refer either to one specific part or to an overall assembly which may, or may not, contain parts with their own OEM numbers.** As such, an industry reference number column 394 is also provided. For example a bumper contains many individual parts such as front and/or back sections, springs, protective covering, etc., each of which has been assigned a distinctly different industry reference number. All of the part numbers for these subparts and assemblies can be accessed by selecting the industry reference number icon. When clicked on, this icon provides a popup window displaying all of the industry reference numbers pertaining to that particular part. (emphasis added)

Therefore, there is not a one-to-one correspondence between an OEM number and an industry reference number. In light of this fact, the Examiner asserts that casting number is an alternate numbering scheme:

Applicant argues that Williams teaches using only industry reference number and OEM number, as the numbering scheme and that OEM number is not an equivalent alternative to the industry reference number. The examiner disagrees since Williams teaches an additional number scheme, casting number, as an alternate way of identifying the parts disclosed in paragraph [0061]. Such casting numbers are geared toward different segments of the industry since a different casting number is used for identifying the same part made in different factories, wherein each factory can be considered a different segment of the same part making industry. Williams also teaches that any form of factory identification can be used to identify a part (lines 14-16 in [0061]).

However, the Examiner mischaracterizes both the nature of the casting numbers taught in Williams as well as the meaning of “different segments of the industry” as defined in the present invention. Regarding the casting number, Williams teaches:

[0060] To explain certain aspects of the RPO number that are accessed from the industry reference number column 394, assume that the part being accessed by the vehicle parts monitoring system 100 is, e.g., a cylinder head for a car. The cylinder head has a standard identification called a casting ID. The casting ID is typically stamped on the cylinder head. The casting ID for many parts is important because it uniquely identifies the part number as well as the factory that produced the part. Consider that some parts (e.g., cylinder heads) for the same model of vehicle can be manufactured in different factories. These parts are manufactured to the same standards, dimensions, and tolerances in each of the different factories so that they can be used interchangeably in a given model of vehicle, but will still have different casting IDs for traceability purposes. As such, there can be multiple versions of the same RPO casting, each having a different casting ID.

[0061] The vehicle parts monitoring system 100 displays (as the RPO number in the pop-up window when the icon in the industry reference number column 394 is selected) the last superseded number by which the part was known. In addition, the vehicle parts monitoring system 100 displays the casting number (stamping number) as another way of identifying the part. Perhaps there are/were three or more factories producing the same part. The vehicle parts monitoring system 100 includes a complete list of casting IDs of all of the authentic parts produced by the different factories (provided that all of the parts have been catalogued). The vehicle parts monitoring system 100 provides a compilation of a plurality of, or all of, the casting IDs applied to the same part. The user can determine, using the vehicle parts monitoring system 100, any form of factory identification used to identify that part. In this manner, different part numbers corresponding to the same OEM number can be captured in the vehicle parts monitoring system 100.

The casting ID merely provides additional identification of the specific manufacturing facility that produced a given part and does not represent an alternate numbering scheme associated with a different segment of an industry and stage of product lifecycle. Despite the Examiner's assertion, each factory is not a different segment of the same part making industry. Rather, they are simply different locations for same segment of the industry, i.e. manufacturing.

The nature of the alternate number schemes accommodated by the present invention is explained in paragraph 0033 of the pending specification:

[0033] The look-up screen presents a plurality of input boxes 62 based upon one of several different numbering systems used in the automotive industry, including blocks for UPC Code 64, Service Part Number 66, Motorcraft® Part Number 68, Engineering Part Number 70. Each numbering system is geared toward a particular segment of the automotive industry and/or stage of the product lifecycle. As an example, The Motorcraft® Part Number may be used by the for

aftermarket parts used in automobiles from Ford Motor Co., Inc. The Engineering Part Number is used by the engineering group of an automobile manufacturer. Parts can be identified by make and model of the vehicle using the Prefix, Base and Suffix numbering system.

Williams only deals with the identification scheme for one segment of the parts industry, manufacturing.

Similarly, Honjo teaches identifying parts according to a part code assigned by the service provider that manufactures the parts. A user may subsequently create an independent control number for managing the user's inventory of parts. However, this is an optional user defined criteria and not equivalent to the claimed invention's use of a plurality of alternate numbering schemes used within different segments of an industry and stages of product lifecycle.

Bailey teaches a method for searching for a part using an identifying alphanumeric string and displaying attributes of the part to the user. Some embodiments of the Bailey invention allow the user to conduct a search without knowing specific formatting and syntax requirements for the system, enabling the search to continue in spite of mistakes in the alphanumeric string entered by the user. Again, there is no teaching or suggestion of using a plurality of alternate numbering schemes geared toward different segments of an industry and stages of product lifecycle.

Because claims 2-7, 9-13 and 15 depend from claims 1 and 8, respectively, they are distinguished from Williams, Honjo and Bailey for the reasons explained above.

Therefore, it is respectfully urged that the rejection of claims 1-13 and 15 under 35 U.S.C. § 103 has been overcome and should be withdrawn.

**Conclusion**

It is respectfully submitted that the claims are now in condition for allowance and are patentable over the cited prior art reference.

A first Office Action on the merits is now respectfully awaited. If there are any outstanding issues that the Examiner feels may be resolved by way of a telephone conference, the Examiner is cordially invited to contact David W. Carstens at 972.367.2001.

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